

## Briefing: Urgent Reforms Needed to Safeguard the UK's Elections From Dirty Money and Undue Influence

**This briefing looks at recent Government measures in relation to electoral integrity, the issues that need to be tackled to ensure the integrity of the next election and at the reforms - of both the UK's laws and enforcement regime - that are needed to tackle them.**

The UK is heading into a general election with seriously weak defences against foreign interference and dodgy money entering our politics. Our electoral finance laws are riddled with loopholes and the enforcement regime is not robust enough. The Electoral Commission has been weakened and is now subject to political direction, and there is no national law enforcement body with real responsibility for policing breaches of electoral law. This poses huge risks to our democracy.

There will be much more money coming into political parties with an 80% rise in the amount of money they can spend compared to the previous election.<sup>1</sup> There may be nearly 3.5 million additional overseas voters who can also donate, with little scope for meaningful checks on who they are and where their money comes from.<sup>2</sup> The Government has resisted calls from independent experts to require parties to check the true source of their donations.<sup>3</sup> As parties rush to fill their war chests ahead of the election, it is essential that safeguards are improved as a matter of urgency.

Public trust is at rock bottom after a series of donation scandals in recent years. Nearly 60% of the public think funding of political parties isn't transparent and only 30% think parties that break the rules will face action.<sup>4</sup> Of 8,000 people surveyed earlier this year, only two in five trusted the current political system.<sup>5</sup> Something must be done, and be seen to be done, to strengthen the resilience of our democracy and restore public trust.

### Recommendations

In light of the issues identified in this briefing, Spotlight recommends the following.

#### (1) Increase checks on donations by political parties

- a. Political parties need to voluntarily implement robust, risk-based 'know your donor' policies on an urgent basis ahead of the next election to prevent foreign state interference and dirty money in our political system, and to restore public trust.<sup>6</sup>
- b. Political parties should commit to legislation that would require all parties to implement 'know your donor' policies, following a consultation on wider reforms and requirements needed for them to be most effective.

## **(2) Tighten up the rules on donations from companies and unincorporated associations**

- a. Company donations should only be made from profits generated in the UK, and donations should not exceed net profits after tax generated in the UK in the preceding two years.<sup>7</sup> Companies should confirm that they comply with this requirement when giving a donation and false declarations should be a criminal offence.
- b. Unincorporated associations (UAs) should be required to undertake permissibility and due diligence checks on all money they receive that is intended as a donation, and to declare the source of all political gifts above £500. There should be a review of whether UAs should be prohibited from donating.

## **(3) Address problems with election finance offences**

- a. There should be a review of whether offences under the Political Parties, Elections and Referendums Act 2000 (PPERA) are broad enough and effective in ensuring that malign or foreign actors cannot donate indirectly, and to ensure that donations cannot be given from the proceeds of crime.

## **(4) Tackle access capitalism and donor influence over policymaking**

- a. Government departments should publish information about all meetings and hospitality involving donors' attempts to influence government; and the Ministerial Code should require Ministers to report any such engagements with donors, when an official is not present (including in party political contexts), to their departments for publication.
- b. If parties are going to run donor groups, they must be conducted transparently and with suitable protections to avoid donors exerting undue influence. This should include prompt publication of the names of donors attending (whether in person or by proxy) and details of any attempt to influence the party or government.

## **(5) Improve enforcement of election finance crime**

- a. The National Crime Agency (NCA) should coordinate the UK's strategic, national enforcement response to election finance crime, and be provided with the immediate resources to create a dedicated election finance unit with specialist expertise.

## **(6) Enhance the Electoral Commission's enforcement powers**

- a. The mechanism in the Elections Act 2022 which enables the government to issue the Electoral Commission with a Strategy and Policy Statement should be scrapped, and the Commission's power to initiate criminal proceedings should be reintroduced.
- b. The maximum fine that the Commission can impose for each offence should be increased from £20,000 to 4% of a campaign's total spend or £500,000, whichever is higher, as previously recommended by the Committee on Standards in Public Life (CSPL),<sup>8</sup> and this figure should be adjusted annually in line with inflation.

# 1. Government policy and emerging issues

## 1.1 National Security Act 2023 - a missed opportunity

The Government has introduced various measures in recent years to help meet the Conservative party's 2019 Manifesto commitment to *"prevent any foreign interference in our elections"*:<sup>9</sup>

- The Defending Democracy Taskforce was set up to tackle *"...the full range of threats facing our democratic institutions"*.<sup>10</sup> Its terms of reference include improving coordination and driving progress in the security of elections, but its activities have been shrouded in secrecy.<sup>11</sup> Members of the Taskforce do not include the Electoral Commission or any external experts.
- The Integrated Review Refresh highlighted the Government's commitment to tackling state threats to the UK's democracy.<sup>12</sup> It noted that the upcoming Anti-Corruption Strategy will detail efforts to strengthen the resilience of our democratic institutions to corruption and influence.

The National Security Act 2023 introduced new foreign interference offences,<sup>13</sup> which come into force on 20 December 2023.<sup>14</sup> Under the 2023 Act, individuals who commit an existing 'relevant electoral offence' under an arrangement, tasking or direction of a foreign power, could face an increased term of imprisonment.<sup>15</sup>

The 2023 Act also requires foreign powers to register 'foreign influence arrangements', which can include providing money to an individual or entity in the UK to influence a UK election.<sup>16</sup> There are offences for those who fail to comply with registration requirements.<sup>17</sup>

Given the loopholes in PPERA, which contains many of the 'relevant electoral offences', and the weak criminal enforcement of those laws, as set out in this note, there are real questions about the extent to which these measures will prevent foreign influence operations in the UK's political system.

- **A missed opportunity to require parties to do proper checks on donations**

The Government repeatedly opposed amendments to the National Security Bill that would have required political parties to identify donations from foreign powers.<sup>18</sup> Its position that *"...the law already makes sufficient provision in relation to donations to political parties"*<sup>19</sup> has been disputed by independent expert bodies. In a 2021 report, CSPL found that *"...the current rules are insufficient to guard against foreign interference in UK elections."*<sup>20</sup> The Chair of the Electoral Commission said electoral law does not do enough *"...to safeguard from unlawful foreign money, or to protect public confidence in the political finance regime"*.<sup>21</sup>

The Government was twice defeated on versions of the amendment in the House of Lords.<sup>22</sup> The measure was strongly supported by security and intelligence experts, including:

- the then Chair of CSPL, Lord Evans, who found *"...it difficult to understand why there should be any objection to ensuring that money donated to a political party in the course of a democratic election is susceptible to enhanced due diligence"*<sup>23</sup> and
- the Chair of the Intelligence and Security Committee (ISC), Sir Julian Lewis, who noted that the Government *"...was inexplicably rejecting the opportunity significantly to improve the transparency and accountability of our political system..."*

When rejecting that amendment, the Government committed to consult on enhancing information-sharing between relevant agencies or public bodies.<sup>24</sup> This will be taken forward by the Department for Levelling Up, Housing and Communities, supported by the Defending Democracy Taskforce.<sup>25</sup> In September 2023, a Minister,

Penny Mordaunt MP, reportedly wrote to the Security Minister calling for a new intelligence-sharing framework between the security services and the UK's main political parties.<sup>26</sup> The Electoral Commission and Metropolitan Police have both previously said that current information-sharing powers are inadequate.<sup>27</sup>

## **1.2 Elections Act 2022 - clipping the wings of the Electoral Commission**

- **Independence of the Electoral Commission**

The Electoral Commission is an independent body accountable to Parliament and the Speaker's Committee of the Commons.<sup>28</sup> However, the Elections Act 2022 gave the Government power to issue a Strategy and Policy Statement for the Commission, in effect removing its regulatory independence.<sup>29</sup> The UK is now out of step with its key democratic allies in having the government set the strategy and policy of its electoral commission.

Significant concerns were raised by those consulted on the Government's draft Statement:<sup>30</sup>

- The Levelling Up, Housing and Communities Committee said that it risks damaging the Commission's independence and undermining public confidence in the democratic process.<sup>31</sup>
- The Electoral Commissioners said the Statement "*is inconsistent with the role that an independent electoral commission plays in a healthy democracy*" and the Government could influence the Commission's operations, decisions, oversight and enforcement of the political finance regime.<sup>32</sup>
- The Speaker's Committee on the Electoral Commission said a revised draft, "*remains not fit for purpose and inconsistent with the Commission's role as an independent regulator*".<sup>33</sup>

- **Electoral Commission's power to initiate criminal proceedings**

The Elections Act also removed the Commission's power to initiate criminal proceedings, although it retains responsibility for civil enforcement.<sup>34</sup> The Commission had not made use of this power, but the removal is likely to weaken its investigative and compliance activities in relation to criminal-only offences under PPERA and the National Security Act - further reducing the criminal deterrence against rogue actors. This is particularly significant in the context of the enforcement gap for election finance crime, outlined further below.

## **1.3 Expanding the overseas franchise - and increasing the risks**

The Elections Act 2022 removed the 15-year limit on British citizens living overseas being eligible to vote in UK elections, extending the franchise to all British citizens who have lived in the UK. Newly eligible voters can register from January 2024 once regulations have passed through Parliament. The government estimates that 3.2 to 3.4 million British nationals living overseas could become eligible to vote, and therefore donate to parties, and would be able to form unincorporated associations where there are two or more registered overseas electors<sup>35</sup> - which will enable them to spend potentially significant amounts of money on UK election campaigns.<sup>36</sup>

When the House of Lords debated the regulations on 12 December 2023, they voted in support of an amendment to the regulations, which said the change could "*dangerously weaken*" restrictions on overseas political donations and allow foreign money into our democracy.<sup>37</sup>

The Electoral Commission previously expressed a concern that the measure may increase levels of fraud.<sup>38</sup> This is particularly due to the fact that overseas voters will be able to provide an attestation of their identity by another overseas voter, and it will be difficult for electoral authorities to enforce penalties against those who

provide false information or attestations.<sup>39</sup> The Government recognised that it may be difficult for the Electoral Commission to enforce restrictions on foreign spending internationally “*as it is outside of their jurisdiction.*”<sup>40</sup>

## **1.4 Raising thresholds for reporting donations**

On 20 July 2023, the Government announced its intention to increase party spending limits in line with inflation and to increase the threshold for parties to report accepted donations to the Electoral Commission.<sup>41</sup> On 20 November 2023, the Government introduced the measures to ensure this increase<sup>42</sup> through a statutory instrument, which means that there was limited parliamentary scrutiny.<sup>43</sup> The Government did not carry out a full impact assessment before introducing the change. Nor did they consult the Electoral Commission, who highlighted that,

*“Any changes to spending or reporting thresholds must be supported by rigorous analysis, including on the likely impact on public confidence and transparency ... We have not seen evidence to support these changes or seen a government analysis of the potential impact of these changes.”*<sup>44</sup>

As a result of this change, the amount that parties can spend on national election campaigns has increased by 80%, up from £19.5m to £35m. Moreover, political parties will be able to accept donations from individuals of up to £11,180 (the threshold was previously £7,500) without declaring their names.<sup>45</sup> As the Electoral Reform Society has highlighted, the Government prioritised increasing the amount of money that can flood into our political system without fixing the significant loopholes in the rules.<sup>46</sup>

## **2. Reforming electoral integrity and regulation**

The UK’s election finance laws are riddled with loopholes - and the enforcement regime is not sufficiently robust to stop foreign influence and dirty money from entering our political system.

Donations from foreign sources harm our democracy and threaten the UK’s national security. Independent bodies and the Security Service (MI5) have warned that states have sought to influence our democratic processes by donating to political parties.

The ISC’s 2020 report on Russia in 2020 found that, “*Several members of the Russian elite who are closely linked to Putin are identified as being involved with charitable and/or political organisations in the UK, having donated to political parties, with a public profile which positions them to assist Russian influence operations.*”<sup>47</sup> A 2023 ISC report noted China’s intent to interfere with the UK Government and influence UK political thinking and decision-making relevant to China, with individuals linked to China’s United Front Work Department receiving “*...funds from overseas sources for onward donation to political parties, prospective Parliamentary candidates.*”<sup>48</sup>

MI5 issued a warning to MPs and peers in 2022 that accused a lawyer of seeking to influence parliamentarians on behalf of China’s Communist Party.<sup>49</sup> In September 2023, further warnings emerged from MI5 about UK parliamentary candidates allegedly spying for China.<sup>50</sup>

In addition, dirty money from politically exposed persons and criminals leaves parties exposed to malign influence, risks fostering dependence on the proceeds of crime and other dubious funds as a source of party finance, and undermines the integrity of our democracy. The Electoral Commission has noted that UK elections law “*is silent on whether or not money obtained from crime would make a political contribution unlawful.*”<sup>51</sup>

### **2.1 Addressing weaknesses in the UK’s election finance laws**

We have set out below the key loopholes and weaknesses in UK election finance laws.

### ● **Checks on donations by political parties**

PPERA only imposes controls on the status of those who can make a donation.<sup>52</sup> It does not require parties and MPs to take a risk-based approach to donations or to identify the true source of donated funds, unlike those in the regulated sector. As the UK's anti-money laundering (AML) framework has tightened over other sectors in the UK over the past decade, the limited requirements on political parties are an increasingly glaring anomaly.<sup>53</sup>

The NCA has said that a donation will be lawful as long as it is from a permissible source and it was the donor's decision to donate, even where the funds derived from a gift from someone overseas.<sup>54</sup>

There is agreement among independent bodies and security experts that UK political finance is vulnerable to foreign influence and that parties should do more thorough checks on donations. This includes the Electoral Commission,<sup>55</sup> CSPL<sup>56</sup> and the ISC.<sup>57</sup> In 2021, CSPL recommended that:

- PPERA should be updated to require parties and non-party campaigners to have appropriate procedures in place to determine the true source of donations; and
- parties and non-party campaigners should be required to develop a risk-based policy for managing donations, proportionate to the level of risk that they are exposed to.

The Government rejected this proposal because it considered current rules to be proportionate.<sup>58</sup>

In December 2023, the Electoral Commission repeated its call for more robust checks:

*"We've seen for some time that public confidence in the transparency of party and campaigner finance is declining. We continue to recommend to the UK Government that it introduces laws to help protect parties from those who seek to evade the law, and give voters more confidence in the process by requiring more checks on the identity of donors."*<sup>59</sup>

Spotlight on Corruption has developed a proportionate and risk-based 'know your donor' policy for political parties, with input from AML and electoral finance experts.<sup>60</sup> The draft policy builds on the recommendations noted above and is informed by AML policies used in the private sector.

If regulations are strengthened to include a requirement on political parties to have a 'know your donor' policy, as we and others recommend, this would need to be underpinned by a credible sanctions regime, adequately resourced enforcement and suitable guidance and training for political parties. Various funding models could be considered, which might include:

- state funding for compliance by political parties, either through central government, Electoral Commission grants or other financial mechanisms; or
- state funding for a centralised compliance unit in the Electoral Commission that assesses donations and advises parties on the implementation of their 'know your donor' policies.

### ● **Donations by companies and LLPs**

A UK-registered company or limited liability partnership (LLP) may donate money to a UK political party provided it "*carries on business in the UK*".<sup>61</sup> However, there is no requirement for a donation from a company or LLP to derive from profits generated in the UK.<sup>62</sup> The Electoral Commission said this broad test of 'carrying

on business' exposes parties to risk, including the risk of accepting the proceeds of crime.<sup>63</sup> The lax rules leave the door open for foreign money and proceeds of crime being channelled to parties via UK-registered shell companies.

- **Risks presented by unincorporated associations**

UAs are a significant risk area and entry point for foreign money to enter our political system. To be a lawful donor, a UA just needs to have more than one member, a main office in the UK, and to be carrying on business or other activities in the UK. Those who give money to UAs are not required to be lawful donors, so UAs can receive and then donate money from unknown sources.<sup>64</sup> In July 2021 it was reported that the UK's main parties accepted £12.9 million in donations from UAs in the previous 5 years, none of which can be connected to the original source of funds.<sup>65</sup>

If a UA that is registered with the Electoral Commission<sup>66</sup> receives political gifts in excess of £7,500, the UA only need to disclose, *"whatever details the unincorporated association knows of the name and address of the person by whom the gift was made"*.<sup>67</sup>

- **Access capitalism and donor influence over policymaking**

There is a direct relationship between donors, the source of their wealth and the health of our democracy. This is a particular risk area given the access that donors are afforded to senior politicians.<sup>68</sup> Access capitalism, in the grey area between official government business and party political activity, shields attempts to influence government decision-making and the consequences of that lobbying from public view.

Equality of access enables decision-makers to make decisions fairly and based on merit, using the best available evidence, rather than under the influence of donors - or other vested interests - with privileged access or deep pockets.<sup>69</sup> If parties are going to run donor groups, they must be conducted transparently and with suitable protections to avoid donors and vested interests unduly influencing party or government policy.

There is also a link between party funding and the honours system, including peerages. One quarter (64 of the 276) of appointees to the House of Lords since 2013 donated over £50m in total to the parties that nominated them.<sup>70</sup> Half of the Conservative party's biggest donors since 2010 received an honour or title.<sup>71</sup>

## **2.2 Tackling inadequate enforcement of the laws**

In addition to these weaknesses in the legal framework, there are significant failings in the criminal enforcement regime and inadequate sanctioning powers in the civil regime.

- **Lack of a lead agency for criminal enforcement of election finance offending**

There is no agency with overall responsibility for leading the UK's strategic, national enforcement response to serious crimes in political finance, which can include hostile state threats and foreign interference / national security risks, as well as suspected money laundering in political finance.

- The Electoral Commission has identified that *"...the overall system is not coherent and does not provide an effective deterrent"* and highlighted an *"enforcement gap"* where cases are not, from a police perspective, in the public interest to take forward. The Commission also identified that police forces' pressured resources are commonly prioritised for more traditional police work.<sup>72</sup>

- The MPS - the only law enforcement agency with specialist electoral finance expertise - has carried out no investigations into key concealment offences under PPERA in the past 13 years: failing to provide information to a party (s.54(7)) and facilitating the making of an unlawful donation (s.61(1)).
- As at July 2020, the MPS had received four referrals from the Electoral Commission relating to PPERA donation offences in total and took no further action in each case.<sup>73</sup> Indeed, the MPS recently highlighted its desire to withdraw from enforcing election finance offences.<sup>74</sup>

From our review of recent cases, it appears that the NCA has taken a backseat in enforcement. In the few cases the agency has commented on in recent years involving alleged donations from foreign sources and/or allegedly linked to money laundering or other criminality, it has expressly ruled out or taken no action in each case. On 5 December 2023, Spotlight on Corruption wrote to the NCA highlighting the enforcement gap and explaining that, in our view, the agency should lead the UK's enforcement response to serious political finance crime, in light of its statutory duties and its considerable tools, powers, capabilities and networks which are not available to other agencies.<sup>75</sup>

### ● Weaknesses in the Electoral Commission's enforcement powers

The Electoral Commission's civil enforcement powers are inadequate. In particular, the maximum fine that the Commission can impose for a breach of PPERA is £20,000 for each offence. As the Commission has identified, this *"Is not a proportionate deterrent for serious offences, and does not incentivise all campaigners to invest in robust compliance procedures."*<sup>76</sup> More than half of respondents to Commission polling said it's not enough.<sup>77</sup>

In February 2022, the House of Lords Democracy and Digital Technology Committee recommended that the maximum fine the Electoral Commission can impose should be £500,000 or 4% of a campaign's total spend, whichever is greater.<sup>78</sup> CSPL has repeated that recommendation - noting that a higher penalty would deter breaches of the rules and incentivise compliance.<sup>79</sup>

<sup>1</sup> Electoral Reform Society (24 November 2023) [New political funding rules sneak in](#)

<sup>2</sup> House of Commons Library (16 November 2023) [Overseas Voters](#)

<sup>3</sup> Spotlight on Corruption (21 June 2023) [Second defeat for government over amendment to protect against foreign donations](#)

<sup>4</sup> Electoral Commission (2023) [Public Opinion Tracker](#)

<sup>5</sup> IPPR (23 June 2023) [Politicians 'miss the point' when urging political reform says report](#)

<sup>6</sup> Spotlight on Corruption (10 May 2023) [Time for a 'know your donor' policy](#)

<sup>7</sup> CSPL (July 2021) [Regulating Election Finance](#) pg. 51

<sup>8</sup> CSPL (July 2021) [Regulating Election Finance](#)

<sup>9</sup> Conservative party (2019) [Manifesto](#); see [Electoral Integrity Programme: Senior Responsible Owner appointment letter](#) (July 2022)

<sup>10</sup> Defending Democracy Taskforce (28 November 2022) [Ministerial Taskforce meets to tackle state threats to UK democracy](#)

<sup>11</sup> Suella Braverman MP (27 March 2023) [Letter to Home Affairs Committee](#)

<sup>12</sup> HM Government (March 2023) [Integrated Review Refresh](#)

<sup>13</sup> Home Office (13 July 2023) [Foreign interference: National Security Bill factsheet](#)

<sup>14</sup> 28 November 2023 (Home Office) [question for Home Office](#)

<sup>15</sup> Section 16, National Security Act 2023; Home Office (13 July 2023) [foreign interference in elections factsheet](#)

<sup>16</sup> Section 69, National Security Act 2023

<sup>17</sup> Home Office (8 September 2023) [Draft Guidance on the Foreign Influence Registration Scheme](#)

<sup>18</sup> Spotlight on Corruption (21 June 2023) [Second defeat for government over amendment to protect against foreign donations](#)

<sup>19</sup> House of Commons (3 July 2023) [Marshalled list for Consideration of Commons Amendment and Reason - National Security Bill](#)

<sup>20</sup> CSPL (July 2021) [Regulating Election Finance](#), p.51

<sup>21</sup> Telegraph (31 May 2022) [Loophole allowing foreign money to influence UK politics 'must be shut'](#)

<sup>22</sup> Spotlight on Corruption (27 June 2023) [Government snubs final chance to take action on foreign political donations](#)

<sup>23</sup> House of Lords (21 December 2022) [debate on National Security Bill](#)

<sup>24</sup> Hansard (4 July 2023) [National Security Bill - debate in the House of Lords](#)



- 
- <sup>25</sup> Parliamentary question (13 July 2023) [Defending Democracy Taskforce](#)
- <sup>26</sup> FT (16 October 2023) [UK minister urges greater access to intelligence for political parties](#)
- <sup>27</sup> Metropolitan Police Service [response to CSPL consultation on the review of the regulation of election finance in the UK](#)
- <sup>28</sup> Electoral Commission - [corporate plan 2022/23 to 2026/27](#)
- <sup>29</sup> Section 16 of the Elections Act 2022 inserted section 4A into PPERA; see Prospect Magazine (June 2022) [the Electoral Commission is now under government control](#)
- <sup>30</sup> Commons Library (December 2022) [government's draft strategy and policy statement](#)
- <sup>31</sup> Levelling Up Housing and Communities Committee (1 December 2022) [response to government's draft strategy and policy statement](#)
- <sup>32</sup> Electoral Commission (February 2022) [letter to government](#)
- <sup>33</sup> Speaker's Committee on the Electoral Commission (6 September 2023) [Response to the draft Strategy and Policy Statement for the Electoral Commission](#)
- <sup>34</sup> Section 19 of the Elections Act 2022 amended Schedule 1 of PPERA
- <sup>35</sup> Section 26 of the Elections Act 2022 inserted section 89A into PPERA; see also Department for Levelling Up, Housing and Communities (13 September 2023) [Non-party campaigner: draft code of practice](#)
- <sup>36</sup> Cabinet Office (1 July 2021) [Elections Bill Impact Assessment](#)
- <sup>37</sup> Spotlight on Corruption (13 December 2023) [New rules on overseas voters increase risk of foreign money influencing UK politics](#)
- <sup>38</sup> Cabinet Office (February 2018) [A democracy that works for everyone: British citizens overseas - Response to feedback](#)
- <sup>39</sup> House of Commons Library (16 November 2023) [Overseas Voters](#)
- <sup>40</sup> Cabinet Office (1 July 2021) [Elections Bill Impact Assessment](#)
- <sup>41</sup> Michael Gove (20 July 2023) [Departmental update](#)
- <sup>42</sup> Jacob Young MP (20 November 2023) [Statement on Election Finance Regulation](#)
- <sup>43</sup> [The Representation of the People \(Variation of Election Expenses, Expenditure Limits and Donation etc. Thresholds\) Order 2023](#)
- <sup>44</sup> Politico (7 December 2023) [London Influence](#)
- <sup>45</sup> Peter Geoghegan (22 November 2023) [Revealed: Britain's broken election laws have just got even worse](#)
- <sup>46</sup> Electoral Reform Society (24 November 2023) [New political funding rules sneak in](#)
- <sup>47</sup> Intelligence and Security Committee (21 July 2020) [Russia report](#)
- <sup>48</sup> Intelligence and Security Committee (13 July 2023) [China report](#)
- <sup>49</sup> Guardian (13 January 2022) [MI5 accuses lawyer of trying to influence politicians on behalf of China](#)
- <sup>50</sup> Guardian (13 September 2023) [Tory party 'acted swiftly' to block would-be MPs after MI5 warnings](#)
- <sup>51</sup> openDemocracy (1 April 2019) [Why the Electoral Commission didn't investigate Vote Leave and DUP donation](#)
- <sup>52</sup> Section 54 of PPERA
- <sup>53</sup> Spotlight on Corruption (December 2022) ['know your donor' rules for political parties](#)
- <sup>54</sup> New York Times (October 2022) [UK officials won't investigate political donations flagged for Russian origins](#)
- <sup>55</sup> Electoral Commission (2018) [Report: Digital campaigning - increasing transparency for voters](#)
- <sup>56</sup> CSPL (July 2021) [Regulating Election Finance](#), p.58
- <sup>57</sup> Commons debate on National Security Bill (3 May 2023) [consideration of Lords Amendments](#)
- <sup>58</sup> Cabinet Office (September 2021) [Government response to Regulating Election Finance](#)
- <sup>59</sup> Electoral Commission (7 December 2023) [Political parties accept over £25m in donations in third quarter of 2023](#)
- <sup>60</sup> Spotlight on Corruption (10 May 2023) [Time for a 'know your donor' policy](#)
- <sup>61</sup> Section 54 of PPERA
- <sup>62</sup> Electoral Commission [guidance on donations and loans](#)
- <sup>63</sup> CSPL (July 2021) [Regulating Election Finance](#) pg. 50
- <sup>64</sup> openDemocracy (5 June 2017) [How dark money is drowning British democracy](#)
- <sup>65</sup> OpenDemocracy (July 2021) [Tories have accepted £2.6m from 'shadowy' donors since Boris Johnson became PM](#)
- <sup>66</sup> UAs have to register with the Electoral Commission if they donate over £25,000 within a year to a regulated entity
- <sup>67</sup> PPERA, Schedule 19A
- <sup>68</sup> The Times (19 February 2022) [The Tory donors with access to Boris Johnson's top team](#)
- <sup>69</sup> Spotlight on Corruption (October 2022) [submission to PACAC inquiry on the Lobbying Act 2014](#)
- <sup>70</sup> Politics Home (27 June 2023) [Peers Have Donated Over £50m To Parties Who Appointed Them To Lords](#)
- <sup>71</sup> Byline Times (9 September 2021) [Quarter of Top Conservative Donors have Received Honours or Peerages](#)
- <sup>72</sup> Electoral Commission (24 July 2020) [response to the CSPL review of electoral regulation](#)
- <sup>73</sup> Metropolitan Police Service [response to CSPL consultation on the review of the regulation of election finance in the UK](#)
- <sup>74</sup> Metropolitan Police Service [response to CSPL consultation on the review of the regulation of election finance in the UK](#)
- <sup>75</sup> Spotlight on Corruption (5 December 2023) [letter to National Crime Agency](#)
- <sup>76</sup> Electoral Commission (24 July 2020) [response to the CSPL review of electoral regulation](#)
- <sup>77</sup> Electoral Commission (24 July 2020) [response to the CSPL review of electoral regulation](#)
- <sup>78</sup> House of Lords Democracy and Digital Technology Committee (7 February 2022) [Democracy and Digital Committee Report: Digital Technology and the Resurrection of Trust](#)
- <sup>79</sup> CSPL (July 2021) [Regulating Election Finance](#)